

EXHIBIT 38

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - - x

JANE DOE 1, individually and on
behalf of all others similarly
situated,

Plaintiff,

Case No.

-against-

1:22-cv-10019-JSR

JPMORGAN Chase BANK NA,

Defendants.

- - - - - x

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----x

GOVERNMENT OF THE UNITED STATES VIRGIN
ISLANDS,

Plaintiff

Vs.

JPMORGAN CHASE BANK, N.A.

-----x

C O N F I D E N T I A L

Videotaped oral deposition of
FRANCIS PEARN taken pursuant to notice,
was held at BOIES SCHILLER FLEXNER LLP,
commencing May 30, 2023, 9:34 a.m., on
the above date, before Leslie Fagin, a
Court Reporter and Notary Public in the
State of New York.

MAGNA LEGAL SERVICES
(866) 624-6221

1 F Pearn

2 MR. BUTTS: Objection. 13:01:06

3 You may answer as a 30(b)(1) 13:01:07

4 witness. 13:01:08

5 A. I didn't do anything particular to 13:01:08

6 check for account statements. 13:01:11

7 Q. We reviewed a number of documents 13:01:12

8 that summarized Epstein's account transaction 13:01:15

9 history. 13:01:18

10 Did anything you reviewed either in 13:01:19

11 preparation or during today's deposition 13:01:22

12 suggest to you that his use of his JPMC bank 13:01:24

13 accounts before 2003 would have been 13:01:28

14 different than how he used his bank accounts 13:01:32

15 from 2003 onward? 13:01:34

16 MR. BUTTS: Object to form. Beyond 13:01:36

17 the scope. 13:01:36

18 You may answer as a 30(b)(1) 13:01:40

19 witness if you are able. 13:01:41

20 A. I did not see anything that would 13:01:45

21 indicate they were used differently prior to 13:01:49

22 that period. 13:01:52

23 Q. Was JPMorgan ever contacted in 13:01:53

24 regards to any government investigation 13:01:57

25 relating to Jeffrey Epstein? 13:01:59

1	F Pearn	
2	MR. BUTTS: Objection.	13:02:02
3	You may answer as a 30(b)(1)	13:02:06
4	witness.	13:02:08
5	A. We received, in July of 2019, a	13:02:09
6	subpoena from the Southern District of New	13:02:16
7	York regarding Jeffrey Epstein.	13:02:20
8	Q. Anything before July of 2019?	13:02:22
9	A. I do not believe so.	13:02:26
10	Q. From any agency?	13:02:31
11	A. That's correct.	13:02:32
12	Q. When did the investigation that	13:02:34
13	began in July 2019 end?	13:02:37
14	MR. BUTTS: Objection.	13:02:42
15	You may answer.	13:02:42
16	You are talking about the Southern	13:02:44
17	District of New York investigation?	13:02:47
18	MR. VILLACASTIN: Yes.	13:02:50
19	MR. BUTTS: You may answer as a	13:02:51
20	30(b)(1) witness, if you are able.	13:02:54
21	A. We continued that investigation up	13:02:55
22	through September of 2019 --	13:02:57
23	MR. BUTTS: He is asking you about	13:03:02
24	the U.S. Attorney's investigation, when	13:03:03
25	did the U.S. Attorney's investigation	13:03:06